

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY, *et al.*,

Plaintiffs,

v.

THE PALESTINE LIBERATION  
ORGANIZATION and THE PALESTINIAN  
AUTHORITY,

Defendants.

Case No. 18-cv-12355 (MKV) (DCF)

**DECLARATION OF JOSEPH S. ALONZO IN SUPPORT OF THE MOTION FOR  
SUMMARY JUDGMENT BY DEFENDANTS PALESTINE LIBERATION  
ORGANIZATION AND PALESTINIAN AUTHORITY**

Joseph S. Alonzo declares as follows:

1. I am an attorney admitted to practice before this Court and a partner at Squire Patton Boggs (US) LLP, counsel to Defendants Palestine Liberation Organization and Palestinian Authority (collectively “Defendants”). I respectfully submit this declaration in support of Defendants’ motion for summary judgment.

2. Submitted with this declaration are true and correct copies of the following documents, which are cited in Defendants’ Statement of Facts as to Which There Is No Genuine Issue pursuant to Local Civil Rule 56.1.

EXHIBIT A: Answer, *Shatsky I*, No. 1:02cv002280 (RJL), ECF 128 (D.D.C. July 20, 2011)

EXHIBIT B: Declaration of Principles on Interim Self-Government Arrangements, Isr.-PLO (1993) (“Oslo I Accord”), Exhibit D to Defendants’ Statement of Material Facts as to Which

There Is No Genuine Issue, *Shatsky I*, No. 1:02cv002280 (RJL), ECF 247-5 (D.D.C. Aug. 12, 2013)

- EXHIBIT C: Transcript of the September 10, 2012 deposition of Raed Taha Mahmud Amayra
- EXHIBIT D: Transcript of the September 11, 2012 deposition of Nadime Al-Barahme
- EXHIBIT E: Transcript of the September 5, 2012 deposition of Abdel Rahim Malouh
- EXHIBIT F: Transcript of the September 6, 2012 deposition of Jawad Amawi
- EXHIBIT G: Transcript of the September 12, 2012 deposition of Ibrahim Dahbour\*
- EXHIBIT H: Decree, Palestinian Supreme Council on National Security (Oct. 22, 2001), Exhibit A to Defendants' Memorandum in Reply to Plaintiffs' Memorandum in Opposition to Motion to Vacate Clerk's Entry of Default, *Shatsky I*, No. 1:02cv002280 (RJL), ECF 98-1 (D.D.C July 21, 2008)
- EXHIBIT I: Interim Agreement on the West Bank and the Gaza Strip, Isr.-PLO (1997) ("Oslo II Accord"), Exhibit 53 to Declaration of Abbe David Lowell, *Shatsky I*, No. 1:02cv002280 (RJL), ECF 330-36 (D.D.C. Jan. 29, 2016)
- EXHIBIT J: Defendants' Objections and Answers to Plaintiffs' Second Set of Interrogatories (Nos. 2-12), Exhibit 54 to Declaration of Abbe David Lowell, *Shatsky I*, No. 1:02cv002280 (RJL), ECF 330-37 (D.D.C. Jan. 29, 2016)
- EXHIBIT K: Memorandum Order, *Shatsky I*, No. 1:02cv002280 (RJL), ECF 242 (D.D.C. Apr. 11, 2013)

I declare under penalty of perjury that the foregoing is true and correct.

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\* Pages 143:19-163:08 of Dahbour's deposition are redacted pursuant to Judge Leon's January 2, 2013 Minute Order in *Shatsky I* granting Defendants' Motion for Return or Destruction of an Inadvertently Produced Document, *Shatsky I*, ECF 170 (D.D.C. Oct. 31, 2012).

Executed on August 20, 2021  
New York, New York



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Joseph S. Alonzo (JA-1378)  
1211 Avenue of the Americas, 26th Floor  
New York, New York 10036  
Telephone: (212) 872-9800  
Facsimile: (212) 872-9815

*Attorney for Defendants*